## EXHIBIT 15

## COWAN, DEBAETS, ABRAHAMS & SHEPPARD LLP

ATTORNEYS AT LAW

FREDERICE P. BIMBLER
TOBY M. J. BUTTERFIELD
AL J. DANIEL, JR.+
TIMOTHY J. DEBABTS
ROBERT L FREEDMAN
ELLIS B. LEVINE
MITCHELL E. RADIN
ROBERT L. SRIGEL
J. STEPHEN SHEPPARD
RALPH J. SUTTON\*
KENNETH N. SWEZEY
DAVID BRUCE WOLF
NANCY E. WOLFF

Philip M. Cowan (1943-2001) Howard Abrahams (1945-1996)

Of Counsel:
Anne C. Baker
Judth A. Bresler
Jerrold B. Gold
Albert Gottesman
Roger E. Kass
Michael D. Remer
Robert F. Van Lierop

November 19, 2007

Correspondent Firm: Donaldson & Hart 9220 Sunset Blvd. Ste. 224 Los Angeles, CA 90069 (310) 273-8394

\*Also Admitted in CA & DC

PALSO Admitted in NJ

\*Also Admitted in AR & DC

ZEERA J. ABDI LISA K. DIGERNES MATTHEW A. KAPLAN<sup>®</sup> M. KILBURG REEDY MASON A. WEISZ

## **VIA ELECTRONIC MAIL**

Counsel on the Attached Service List

Re: Lyons Partnership, L.P., et al. v. Party Art Productions, Inc., et al.

**Docket No. 07-7121 (LLS)** 

Dear Counsel:

Please accept this letter as Plaintiffs' response to Mr. Pinnisi and Mr. Ingber's e-mails of Friday, November 16, 2007 in which they allege deficiencies in Plaintiffs' November 15, 2007 document production.

Pursuant to Judge Stanton's direction at the October 9, 2007 Initial Conference, Plaintiffs produced their investigation files for each of the defendants. We are unaware of any written instructions or scripts that were provided to the investigators prior to their investigation of your clients.

Accordingly, Plaintiffs deny that there are deficiencies in their document production.<sup>1</sup>

Very truly yours,

Matthew A. Kaplan

MAK/ms

cc: Toby M.J. Butterfield, Esq.

Specifically, we note Mr. Pinnisi's objection to an alleged failure to produce notes of the initial contact between our investigator and Mr. Pinnisi's clients. To the contrary, the notes produced regarding Ms. Sherman's August 2, 2005 contact with his clients do not indicate that his clients "denied offering any costumes" – a fact that is supported by the rest of the correspondence produced. There is no evidence of spoliation of evidence, and Plaintiffs would appreciate Mr. Pinnisi withdrawing his accusation.

Counsel on Service List November 19, 2007 Page 2

## **SERVICE LIST**

Brian J. Greenfield, Esq.
Greenfield, Pusateri & Ruhl
626 Rexcorp Plaza
Uniondale, NY 11516
516-522-2565 (telephone)
516-522-2566 (facsimile)
E-mail: brian.greenfield@gprlaw.com

Attorneys for Defendant Eric Silvey d/b/a Eric Silvey Entertainment

Mark J. Ingber, Esq.
Ingber & Gelber, LLP
181 Millburn Ave
Millburn, NJ 07041
973-921-0080 (telephone)
973-921-0021 (facsimile)
E-mail: ingber.law@verizon.net
Attorneys for Party Art Defendants and Magic Agency Defendants

Gary Adelman, Esq.
Barton, Barton & Plotkin, LLP
420 Lexington Ave
New York, NY 10170
212-687-6262 (telephone)
212-687-3667 (facsimile)
E-mail: Gary@bartonesq.com
Attorneys for Defendants Party Poopers, Inc. and Marla Mase

Michael D. Pinnisi, Esq.
Pinnisi & Anderson, LLP
11 North Tioga Street, Suite 200
Ithaca, NY 14850
607-257-8000 (telephone)
607-257-0990 (facsimile)
E-mail: mpinnisi@pinnisianderson.com
Attorneys for Save the Date Defendants